



KAISER • HILL
COMPANY

RECEIVED

T G Hedahl

MAY 10

Act on to _____ Info Only *Hahn*

INTEROFFICE MEMORANDUM

DATE May 6 1996
TO Alan M Parker RMRS Bldg T893B X4163
FROM Karan North Compliance & Performance Assurance Bldg T130C X9876 *von*
SUBJECT UPDATE TO RMRS COMPLIANCE ISSUE/RESOLUTION TABLE KN-090-96

The following information is being provided to update you on the first two items listed on your April 1 1996 RMRS Compliance Issues/Resolution table. It is Kaiser Hill's position that with this information these two items can be considered resolved and removed from future tables.

- 1) Groundwater monitoring including sample collection laboratory analyses and quarterly/annual reporting. Current scope assumes regulatory relief.

G M Kelly wrote a letter to DOE RFFO [for subsequent transmittal to CDPH&E and EPA Region VIII] on March 19 1996 asking for concurrence that RFFETS formally reduce the number of monitoring wells from approximately 350 (FY95) to 150 wells in FY96. In addition this letter confirmed the reduction in sample collection and analyses by analyte. DOE RFFO subsequently transmitted this letter to the regulators on April 10 1996. DOE RFFO (S Slaten) subsequently received a copy of a joint CDPH&E and EPA Region VIII letter on April 4 1996 approving informally faxed request (by S Singer) for approval of the Site's FY96 groundwater program scope. For your convenience copies of these three letters are attached.

- 2) Surface water monitoring including sample collection laboratory analyses and semi annual reporting as required by NPDES/FFCA. BCWS and BCWP assumes regulatory relief.

Kaiser Hill received a concurrence letter dated March 6 1996 to the Site's approach to modify the NPDES/FFCA field activity and reporting requirements. Upon RMRS's review of this letter the consensus was that the regulatory relief was not explicit enough. This position was conveyed through a 4/11/96 memorandum (JEL-042 96) from J E Law to K North. In response to this RMRS request to send another clarifying request to the regulators Kaiser Hill opted to include the request for clarification in the semi annual NPDES FFCA status report sent to DOE RFFO on 4/26/96 and hand delivered to the EPA on 4/30/96. For your convenience copies of these three letters are attached.

Please contact me if you have any questions on these two items.

Enc (as stated (1) three attachments (2) three attachments)

cc
E Phillips (K H)
T G Hedahl (K H)
J Hill (K H)
C Jierree (RMRS)

G M Kelly (RMRS)
J Law (RMRS)
K Motyl (RMRS)
G H Setlock (K H)



ADMIN RECORD

1/34

DOE ORDER

96-RF-01761

DIST	LTR	ENC
BENSUSSEN, STAN		
BUHL, TONY		
CARD BOB		
GILLISON W R.		
HERRING, C L		
HILL, J A	X	
HUEMAN T P		
KELL, R E		
LEE, L M.		
MANI VIC		
MARTINEZ, L A.		
MCANALLY, J L		
MCKAY R.		
MCKIBBIN J. G.		
O'BRIEN, G. D		
SANDLIN, N. B.		
TUOR, N. R.		
VOORHEIS, G. M.		
WALLER, C. A.		

G. Setlock	X	X
E. Singer	X	X
J. Law	X	X
S. M. Kelly	X	X

March 19 1996

96-RF-01761

Jessie Roberson
ESH&PA
DOE RFFOCONFIRMATION OF CHANGES TO THE RFETS GROUNDWATER PROGRAM-
GMK-024-96

This letter is a notification of the changes to the RFETS groundwater monitoring program that were made effective October 1 1995

In May 1995 a groundwater monitoring working group was convened to re-evaluate the Site's groundwater program. The group was composed of representatives from DOE, EPA, CDPHE and the Kaiser Hill Team. The group was tasked with evaluating the monitoring network and making recommendations for a technically defensible, cost-effective program that met minimum compliance requirements while providing adequate groundwater surveillance for the Site. The working group met from May through September 1995 and independently identified wells that would be in the monitoring program.

Enclosed is a consensus listing of the wells that were proposed for the program including the sampling frequency. The consensus monitoring well network was implemented on October 1 1996. In addition, the analyte suite was modified to a suite that was more aligned with the actual contaminants of concern for groundwater. The enclosed list of parameters represents the current sampling suite for groundwater.

Although these changes have already been implemented, an updated groundwater management plan will be produced by June 1 which will document these and other programmatic changes. It was felt that notification of the changes should occur prior to finalization of the management plan because the program is still involved in ongoing negotiations which could impact the plan.

CORRES CONTROL X X
ADMIN RECD/080
TRAFFIC
PATS/1303CLASSIFICATION
UCNI
UNCLASSIFIED
CONFIDENTIAL
SECRET

AUTHORIZED CLASSIFIER

SIGNATURE
Date: 3/19/96
IN REPLY TO RFP CC NOACTION ITEM STATUS
CLOSED
LTR APPROVALS

ORIG. & TYPIST INITIALS

SS/HS S&S

RF-48489 (Rev 4/25/95)

Kaiser Hill Company L.L.C.

Former Address Rocky Flats Environmental Technology Site State Hwy 93 and Cactus, Rocky Flats, CO 80007 • 303 966 7000

New Address PO Box 464 Golden, Colorado 80402-0464

96-RF-01761
Page 2

A draft transmittal letter to CDPH&E and EPA is attached for your review and modification. Please contact me at X4979 or George Setlock at X4457 if you have any questions on this topic.

Gerry Kelly

Gerry M Kelly
ER/WM&I
Kaiser Hill Company L.L.C

SS'ses

Enclosure
As Stated

Orig. and 1 cc J. Roberson

CURRENT RFETS GROUNDWATER MONITORING NETWORK

FREQ	WELLNO	CLASS	FORMATION	DESCRIPTION
Semiannual	2586	P	BD	EPA Required – LHSU Bedrock
Semiannual	75292	D	AL	So Walnut Below Pond B5
Semiannual	77392	D	AL	RCRA Downgradient – LF
Semiannual	7086	D	AL	Woman Cr Below Old Landfill
Semiannual	6486	D	AL	No Woman Cr below 881/904 pad
Semiannual	2987	D	AL	Woman Cr Below OU2 Outfall
Semiannual	12094	D	AL	No Name Gulch below current landfill
Semiannual	6586	D	AL	No side Woman Cr below OU2
Semiannual	6686	D	AL	No side Woman Cr downgradient of IA
Semiannual	76992	D	AL	RCRA Downgradient – LF
Semiannual	6886	D	AL	Woman Cr Below 881 Hillside
Semiannual	B102389	D	AL	Rock Cr Below new landfill
Semiannual	38591	D	AL	Woman Cr Drainage below 881 Hillside
Semiannual	10294	D	AL	SE Drainage below D2 Pond
Semiannual	75992	D	AL	South Walnut Cr Below STP
Semiannual	5587	D	AL	No Woman below Fr Drain on 881 Hillside
Semiannual	12691	S	BD/UHSU	Perimeter Monitoring – OU2
Semiannual	B202589	B	AL	Rock Creek at Site boundary
Semiannual	35691	PM	AL	IM/IRA for French Drain
Semiannual	B208289	P/D	BD/UHSU	RCRA Monitoring Below ITS – SEP
Semiannual	P210089	P/D	BD	RCRA Monitoring North – SEP
Semiannual	06291	P	BD	EPA/CDH Required – OU2
Semiannual	5686	D	AL	No Woman Cr below IHSS 133 *
Semiannual	10894	B	AL/BD	Agreement In Principal
Semiannual	59393	D	AL	No Woman Creek below old landfill IHSS
Semiannual	10794	D	AL	Walnut Cr Below confluence of three forks
Semiannual	10594	D	AL	No Walnut between A1 & A2 Pond
Semiannual	31791	D	AL/BD	Woman Cr Below 881 Hillside
Semiannual	53194	D		No Name Gulch below current landfill
Semiannual	3786	D		So Walnut Creek below B4 Pond
Semiannual	37791	P	AL	EPA Required IA above Bldg 881
Semiannual	03791	P	BD/UHSU	Perimeter Monitoring – OU2
Semiannual	03691	P	BD/UHSU	Perimeter Monitoring – OU2
Semiannual	05091	P	AL	Perimeter Monitoring – OU2
Semiannual	02591	P	BD/UHSU	Perimeter Monitoring – OU2
Semiannual	12491	P	BD/UHSU	Perimeter Monitoring – OU2
Semiannual	6786	P	AL	EPA Required – Plant Perimeter
Semiannual	4787	P	AL	Perimeter Monitoring – 881
Semiannual	6386	P	AL	Perimeter Monitoring – OU1
Semiannual	06091	P	AL/BD	Perimeter Monitoring – OU2
Semiannual	1187	P	BD/UHSU	Perimeter Monitoring – OU2
Semiannual	05293	P	AL	Perimeter Monitoring
Semiannual	11691	P	BD/UHSU	Perimeter Monitoring – OU2
Semiannual	05991	P	AL	Perimeter Monitoring – OU2
Semiannual	13391	P	AL	Perimeter Monitoring – OU2
Semiannual	P114389	D	AL	Upgradient Walnut Cr Monitoring
Semiannual	04991	P	AL	Perimeter Monitoring – OU2
Semiannual	2186	P	BD/UHSU	IM/IRA For IA – Plant Perimeter

Semiannual	1487	P	BD	Perimeter Monitoring -- OU2
Semiannual	3986	P	AL	EPA Request Perimeter Monitoring -- OU2
Semiannual	3087	P	BD	Perimeter Monitoring -- OU2
Semiannual	6286	P	BD/USHU	Perimeter Monitoring -- OU2
Semiannual	4887	P	AL	Perimeter Monitoring -- 881
Semiannual	B208789	D	AL	No Walnut Cr Monitoring
Semiannual	5387	P	AL	Perimeter Monitoring below 881
Semiannual	0487	P	AL	Perimeter Monitoring -- OU1
Semiannual	P218289	P	AL	Perimeter Monitoring -- OU4
Semiannual	04091	P	AL	Perimeter Monitoring -- OU2
Semiannual	10194	P	AL	Perimeter Monitoring -- OU2
Semiannual	01291	P	AL	Perimeter Monitoring -- OU2
Semiannual	41091	D	AL	No Walnut below pond A4
Semiannual	05391	S	AL	Source Monitoring -- OU2
Semiannual	P119389	U	AL	IM/IRA For Industrial Area
Semiannual	10694	D	AL	No Walnut between A3 & A4 Pond
Semiannual	00391	P	BD	EPA Required -- Plant Perimeter
Semiannual	1786	P/D	AL	RCRA Monitoring Below ITS -- SEP
Semiannual	1386	P/D	AL	RCRA Monitoring Below ITS -- SEP
Semiannual	10994	P	AL	No side of Woman Cr downgradient of IA
Semiannual	06391	P	AL	EPA/CDH Required -- OU2
Semiannual	2986	P	AL	RCRA Monitoring East -- SEP
Semiannual	B208089	P	AL	RCRA Monitoring North -- SEP
Semiannual	04591	P	AL	Plume Monitoring -- OU2
Semiannual	1087	S	AL	Source Monitoring -- OU1
Semiannual	P215789	S	AL	IM/IRA For Industrial Area
Semiannual	07391	S	AL/BD	Source Monitoring -- OU2
Semiannual	10991	S	BD	EPA required Plume Monitoring -- OU2
Semiannual	03991	P	AL	Plume Monitoring OU2
Semiannual	31491	P	AL/BD	IM/IRA for French Drain
Semiannual	P320089	S	AL	EPA Required -- Industrial Area
Semiannual	08091	S	AL	Source Monitoring -- OU2
Semiannual	03191	S	AL	Source Monitoring -- OU2
Semiannual	70493	U	BD/UHSU	RCRA Bedrock Upgradient Well -- LF
Semiannual	B208589	P/D	AL	RCRA Monitoring Below ITS -- SEP
Semiannual	1986	P	AL	IM/IRA For IA -- Plant Perimeter
Semiannual	00491	S	AL/BD	Source Monitoring -- OU2
Quarterly	P209689	P	AL	RCRA Monitoring East -- SEP
Quarterly	52894	D		RCRA Downgradient Well -- LF
Quarterly	10792	PM	AL	IM/IRA For French Drain
Quarterly	10992	PM	AL	IM/IRA For French Drain
Quarterly	4087	D	AL	RCRA Downgradient Well -- LF
Quarterly	6687	P	AL	RCRA Compliance Well -- LF
Quarterly	P416789	P	AL	IM/IRA For Industrial Area
Quarterly	10192	PM	AL	IM/IRA For French Drain
Quarterly	10092	PM	AL	IM/IRA for French Drain
Quarterly	10692	PM	AL	IM/IRA for French Drain
Quarterly	10492	PM	BD/UHSU	IM/IRA For French Drain
Quarterly	70093	U	AL	RCRA Upgradient Well -- LF
Quarterly	11092	PM	AL	IM/IRA For French Drain
Quarterly	P219189	P	AL	Perimeter Monitoring -- 771

Quarterly	2486	U	AL	RCRA Upgradient Well - SEP
Quarterly	10392	PM	AL	IM/IRA For French Drain
Quarterly	P416289	U	AL	IM/IRA For Industrial Area
Quarterly	P313589	P	AL	IM/IRA For Industrial Area
Quarterly	52994	D		RCRA Downgradient Well - LF
Quarterly	P213989	P	AL	IM/IRA For Industrial Area
Quarterly	P314289	P	AL	IM/IRA For Industrial Area
Quarterly	P416589	U	AL	IM/IRA For Industrial Area
Quarterly	P209289	U	AL	RCRA Upgradient Well - SEP
Quarterly	1586	D	AL	RCRA Monitoring Below ITS - SEP
Quarterly	10892	PM	BD/UHSU	IM/IRA For French Drain
Quarterly	P416889	P	AL	IM/IRA For Industrial Area
Quarterly	43392	P	AL	IM/IRA for French Drain
Quarterly	P419689	P	AL/BD	IM/IRA For Industrial Area
Quarterly	P207889	P	AL	RCRA Monitoring Well - SEP
Quarterly	1886	P/D	AL	RCRA Monitoring Below ITS - SEP
Quarterly	P114889	S	AL	IM/IRA For Industrial Area
Quarterly	6186	S	AL	IM/IRA For Industrial Area
Quarterly	5887	U	AL	RCRA Upgradient Well - LF
Quarterly	P115589	S	AL	IM/IRA For Industrial Area
Quarterly	P115689	S	AL	IM/IRA For Industrial Area
Quarterly	P313489	O	AL	IM/IRA For Industrial Area
Quarterly	P416989	S	BD	IM/IRA For Industrial Area
Quarterly	P219489	P	AL	RCRA Monitoring East - SEP
Quarterly	70393	U	AL	Upgradient Contamination
Quarterly	P209589	P	BD	RCRA Monitoring Well - SEP
Quarterly	P209389	U	BD	RCRA Upgradient Well - SEP
Quarterly	76292	P	BD/USHU	RCRA Monitoring
Quarterly	P207389	P	BD/UHSU	RCRA Compliance Well
Quarterly	45391	PM	AL	IM/IRA for French Drain
Quarterly	B208189	P	BD/UHSU	RCRA Monitoring North - SEP
Quarterly	P115489	S	AL	IM/IRA For Industrial Area
Quarterly	P207789	P	BD/UHSU	RCRA Monitoring East - SEP
Quarterly	P114789	S	AL	IM/IRA For Industrial Area
Quarterly	P207989	P	BD	RCRA Monitoring East - SEP
Quarterly	0386	B	BD/UHSU	Agreement In Principal
Quarterly	41591	B	AL	Agreement In Principal
Quarterly	P416689	P	AL	IM/IRA For Industrial Area
Quarterly	10592	PM	AL	IM/IRA for French Drain
Quarterly	10292	PM	BD/UHSU	IM/IRA For French Drain
Quarterly	10394	D	AL	Agreement In Principal
Quarterly	P207689	P	AL	RCRA Monitoring East - SEP
Quarterly	2686	P	AL	RCRA Monitoring South - SEP
Quarterly	P114589	U	BD/UHSU	IM/IRA For Industrial Area
Quarterly	P209789	R	AL	RCRA Monitoring East - SEP
Quarterly	70593	U	BD	Upgradient Contamination
Quarterly	B210389	P/D	BD/UHSU	RCRA Monitoring Below ITS - SEP
Quarterly	41691	B	AL	Agreement In Principal
Quarterly	06491	B	BD/UHSU	Agreement In Principal
Quarterly	P114689	S	AL	IM/IRA For Industrial Area
Quarterly	B208689	P/D	BD/UHSU	RCRA Monitoring Below ITS - SEP

NOTICE:

"BEST AVAILABLE COPY"

**PORTIONS OF THE FOLLOWING
DOCUMENT ARE ILLEGIBLE**

The Administrative Record Staff

Quarterly	B206989	DU	BB/UHSU	RCRA Monitoring West - LF
Quarterly	70193	U	BB/UHSU	RCRA Monitoring West - LF
Quarterly	B210489	P/D	AL	RCRA Monitoring Below ITS - SEP
Quarterly	P218389	P	AL	RCRA Monitoring East - SEP
0				
		P	Perimeter	
		B	Boundary	
		D	Drainage	
		PM	Performance	
		S	Source	
		U	Upgradient	

DRAFT

96 DOE XXXXX

Mr Tim Rehder
U S Environmental Protection Agency Region VIII
Rocky Flats Project manager 8HWM-RI
999 18th Street Suite 500 8WM-C
Denver Colorado 80202-2405

Best Available Copy

Mr Joe Schenfeldt, Unit leader
Hazardous Waste Control Program
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver Colorado 80222 1530

Gentlemen

This letter is a notification of the changes to the RFETS groundwater monitoring program that were made effective October 1 1995. In May 1995 a groundwater monitoring working group was convened to re-evaluate the Site groundwater program. The group was composed of representatives from DOE, EPA, CDPHE, and the Kaiser-Hill Team. The group was tasked with evaluating the monitoring network and making recommendations for a technically defensible, cost-effective program that met minimum compliance requirements while providing adequate groundwater surveillance for the Site. The working group met from May through September 1995 and independently identified wells that would be in the monitoring program.

Enclosed is a consensus listing of the wells that were proposed for the program including the sampling frequency. The consensus monitoring well network was implemented on October 1 1996. In addition, the analyte suite was modified to a suite that was more aligned with the actual contaminants of concern for groundwater. The enclosed list of parameters represents the current sampling suite for groundwater. Although these changes have already been implemented, an updated groundwater management plan will be produced by June 1 which will document these and other programmatic changes.

Please review the documented changes to the RFETS groundwater monitoring program and provide any issues that are inconsistent to the FY96 program scope mutually agreed to in the CY95 technical working group sessions. If you have any questions regarding this topic please contact Steve Tower at (303) 966-2133 or Reg Tyler at (303) 966-5927.

Sincerely

Bob April Group Lead
Environmental Liaison Group

Enclosures

9

CORRES CONTROL
INCOMING LTR NO

00515 RF96

DUE
DATE

ACTION

DIST	TR	ENC
ALLEN, R C		
BENSUSSEN, S J		
BRENNAN, P D		
BRYNER, C J		
BUHL, T R		
CARD, R G		
DEAN, C		
EVANS, B L		
FERRERA, D W		
GILLISON, W R		
HEDAHL, T G		
HERRING, C L		
HILL, J A		
KELL, R E		
KELLY, G M	X	X
MANI, V		
MARTINEZ, L A		
MCANALLY, J L		
MCGOVERN, L J		
McKIBBIN, J G		
MEADOWS, S M		
NORTH, K		
O'BRIEN, G D		
SANDLIN, N B		
SHUMWAY, W K		
SPEARS, M S		
STEELMAN, M		
TUOR, N R		
TURNER, K A		
VOORHEIS, G M		
WALLER, C A		
Setlock, G	X	X
EVANS, S	X	X
Lozeth, T	X	X
Singer, S	X	X
Grothard, T	X	X
Phillips, F	X	X

CORRES CONTROL	X	X
ADMIN RECORD/080		
PATS/T130G		

Reviewed for Addressee
Corres Control RFP

4/12/96
DATE BY

Ref Lt

DOE ORDER # 5400.1



Department of Energy

ROCKY FLATS FIELD OFFICE
P O BOX 928
GOLDEN COLORADO 80402-0928

APR 10 1996

96 DOE-0949

Mr Tim Rehder
U S Environmental Protection Agency Region VIII
Rocky Flats Project Manager 8HWM RI
999 18th Street Suite 500 8WM C
Denver Colorado 80202 2405

Dear Mr Rehder

The U S Department of Energy/Rocky Flats Field Office (DOE/RFFO) is transmitting this correspondence as a notification of changes to the Rocky Flats Environmental Technical Site ground water monitoring program that were made effective October 1 1995 In May 1995 ground water monitoring and well evaluation working group was convened to re-evaluate the Site ground water program The group was composed of representatives from DOE/RFFO the Environmental Protection Agency (EPA) Region VIII the Colorado Department of Public Health and Environment (CDPHE) and the Kaiser Hill Team

The group was tasked with evaluating the monitoring network and making recommendations for a technically defensible cost-effective program that met minimum compliance requirements while providing adequate ground water surveillance for the Site The working group met from May through September 1995 and independently identified wells that would be in the monitoring program provided justification for those wells identified the sampling frequency and analyte lists

Enclosed is a consensus listing of the wells that were proposed for the program including the sampling frequency The consensus monitoring well network was implemented on October 1 1995 In addition the analyte suite was modified to a suite that was more aligned with the actual contaminants of concern for ground water The enclosed list of parameters represents the current sampling suite for ground water Although these changes have already been implemented an updated ground water management plan will be produced by June 1 1996 which will document these and other programmatic changes

Please review the enclosure and provide any issues that are inconsistent to the Fiscal Year 96 program scope mutually agreed to in the 1995 technical working group sessions If you have any additional questions regarding this topic please contact Norma I Castaneda at (303) 966-4226

Sincerely

Bob April Lead
Stakeholder & Environmental Liaison Group

Enclosure

CURRENT RFETS GROUNDWATER MONITORING NETWORK

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Semiannual	31491	P	AL/BD	IM/IRA for French Drain
Semiannual	P320089	S	AL	EPA Required – Industrial Area
Semiannual	08091	S	AL	Source Monitoring – OU2
Semiannual	03191	S	AL	Source Monitoring – OU2
Semiannual	70493	U	BD/UHSU	RCRA Bedrock Upgradient Well – LF
Semiannual	B208589	P/D	AL	RCRA Monitoring Below ITS – SEP
Semiannual	1986	P	AL	IM/IRA For IA – Plant Perimeter
Semiannual	00491	S	AL/BD	Source Monitoring – OU2
Quarterly	P209689	P	AL	RCRA Monitoring East – SEP
Quarterly	52894	D		RCRA Downgradient Well – LF
Quarterly	10792	PM	AL	IM/IRA For French Drain
Quarterly	10992	PM	AL	IM/IRA For French Drain
Quarterly	4087	D	AL	RCRA Downgradient Well – LF
Quarterly	6687	P	AL	RCRA Compliance Well – LF
Quarterly	P416789	P	AL	IM/IRA For Industrial Area
Quarterly	10192	PM	AL	IM/IRA For French Drain
Quarterly	10092	PM	AL	IM/IRA for French Drain
Quarterly	10692	PM	AL	IM/IRA for French Drain
Quarterly	10492	PM	BD/UHSU	IM/IRA For French Drain
Quarterly	70093	U	AL	RCRA Upgradient Well – LF
Quarterly	11092	PM	AL	IM/IRA For French Drain
Quarterly	P219189	P	AL	Perimeter Monitoring – 771

Quarterly	2486	U	AL	RCRA Upgradient Well – SEP
Quarterly	10392	PM	AL	IM/IRA For French Drain
Quarterly	P416289	U	AL	IM/IRA For Industrial Area
Quarterly	P313589	P	AL	IM/IRA For Industrial Area
Quarterly	52994	D		RCRA Downgradient Well – LF
Quarterly	P213989	P	AL	IM/IRA For Industrial Area
Quarterly	P314289	P	AL	IM/IRA For Industrial Area
Quarterly	P416589	U	AL	IM/IRA For Industrial Area
Quarterly	P209289	U	AL	RCRA Upgradient Well – SEP
Quarterly	1586	D	AL	RCRA Monitoring Below ITS – SEP
Quarterly	10892	PM	BD/UHSU	IM/IRA For French Drain
Quarterly	P416889	P	AL	IM/IRA For Industrial Area
Quarterly	43392	P	AL	IM/IRA for French Drain
Quarterly	P419689	P	AL/BD	IM/IRA For Industrial Area
Quarterly	P207889	P	AL	RCRA Monitoring East – SEP
Quarterly	1886	P/D	AL	RCRA Monitoring Below ITS – SEP
Quarterly	P114889	S	AL	IM/IRA For Industrial Area
Quarterly	6186	S	AL	IM/IRA For Industrial Area
Quarterly	5887	U	AL	RCRA Upgradient Well– LF
Quarterly	P115589	S	AL	IM/IRA For Industrial Area
Quarterly	P115689	S	AL	IM/IRA For Industrial Area
Quarterly	P313489	O	AL	IM/IRA For Industrial Area
Quarterly	P416989	S	BD	IM/IRA For Industrial Area
Quarterly	P219489	P	AL	RCRA Monitoring East – SEP
Quarterly	70393	U	AL	Upgradient Contamination
Quarterly	P209589	P	BD	RCRA Monitoring Well – SEP
Quarterly	P209389	U	BD	RCRA Upgradient Well – SEP
Quarterly	76292	P	BD/USHU	RCRA Monitoring
Quarterly	P207389	P	BD/UHSU	RCRA Compliance Well
Quarterly	45391	PM	AL	IM/IRA for French Drain
Quarterly	B208189	P	BD/UHSU	RCRA Monitoring North – SEP
Quarterly	P115489	S	AL	IM/IRA For Industrial Area
Quarterly	P207789	P	BD/UHSU	RCRA Monitoring East – SEP
Quarterly	P114789	S	AL	IM/IRA For Industrial Area
Quarterly	P207989	P	BD	RCRA Monitoring East – SEP
Quarterly	0386	B	BD/UHSU	Agreement In Principal
Quarterly	41591	B	AL	Agreement In Principal
Quarterly	P416689	P	AL	IM/IRA For Industrial Area
Quarterly	10592	PM	AL	IM/IRA for French Drain
Quarterly	10292	PM	BD/UHSU	IM/IRA For French Drain
Quarterly	10394	D	AL	Agreement In Principal
Quarterly	P207689	P	AL	RCRA Monitoring East – SEP
Quarterly	2686	P	AL	RCRA Monitoring South – SEP
Quarterly	P114589	U	BD/UHSU	IM/IRA For Industrial Area
Quarterly	P209789	R	AL	RCRA Monitoring East – SEP
Quarterly	70593	U	BD	Upgradient Contamination
Quarterly	B210389	P/D	BD/UHSU	RCRA Monitoring Below ITS – SEP
Quarterly	41691	B	AL	Agreement In Principal
Quarterly	06491	B	BD/UHSU	Agreement In Principal
Quarterly	P114689	S	AL	IM/IRA For Industrial Area
Quarterly	B208689	P/D	BD/UHSU	RCRA Monitoring Below ITS – SEP

Quarterly	B206989	D	BD/UHSU	RCRA Downgradient Well – LF
Quarterly	70193	U	BD/UHSU	RCRA Upgradient Well – LF
Quarterly	B210489	P/D	AL	RCRA Monitoring Below ITS – SEP
Quarterly	P218389	P	AL	RCRA Monitoring East – SEP
0				
		P – Perimeter		
		B – Boundary		
		D – Drainage		
		PM – Performance		
		S – Source		
		U – Upgradient		

PROPOSED ANALYSE SUITE	
BOTTLECODE	SUITE
RAD	Rad Screen
VOC	524 2 Complete List
RAD	Gross Alpha/Beta
RAD	PU/AM
METALS	Ba, Ni, Li, Se Cr, Ca, Mg K, Na
RAD	Radium 226/228
RAD	Uranium Isotopes
Water Qual	Nitrate/Nitrite
RAD	TRITIUM
Water Qual	TDS
Water Qual	CO3 HCO3, Cl, SO4

RMRS, L.L.C.

*Rocky Flats Environmental Technology Site
P O Box 464 Golden CO 80402-0464
303 966 4842
Fax 303 966-2623*

FAX TRANSMISSION COVER SHEET

*Date April 11 1996
To George Setlock
Fax 3578
Re Approval of Current Groundwater Monitoring Scope
Sender John E Law*

**YOU SHOULD RECEIVE 6 PAGE(S) INCLUDING THIS COVER SHEET IF
YOU DO NOT RECEIVE ALL THE PAGES PLEASE CALL 303 966-4842**

George Attached for your use is a letter from the EPA and CDPHE approving the current scope of work for the groundwater monitoring program I am on the cc. list because I expressed our compliance concerns to Carl Spreng CDPHE with the permission of (and in the presence of) Dave Shelton K H The list of wells that Steve Singer provided was a duplicate of the list sent to you on March 8 1996 Hopefully, this will put an end to any RMRS and K H fears that the program is out of compliance because we had no written confirmation of oral agreements



STATE OF COLORADO

Roy Roemer, Governor
Patti Swayder, Acting Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

4300 Cherry Creek Dr. S.
Denver, Colorado 80222-1530
Phone (303) 692-3300
Fax (303) 759-5355

222 S. Oak Street, Room 212
Grand Junction, Colorado 81501-2768
Phone (303) 248-7184
Fax (303) 248-7198



Colorado Department
of Public Health
and Environment

April 4 1996

Steve Slaten
IAG Project Coordinator-ER
Department of Energy
Rocky Flats Office
P O Box 928
Golden CO 80402-0928

RE: Ground water monitoring well program

Dear Mr. Slaten.

The attached list of monitoring wells was provided to CDPHE and EPA by Steve Singer. It has been reviewed and determined acceptable as the ground water monitoring plan for FY96. We encourage continued appraisal of the ground water monitoring program through the Data Quality Objective process to support these decisions and provide the basis for yearly evaluations.

Sincerely

A handwritten signature in dark ink, appearing to read "Susan Chaki".

Susan Chaki
Corrective Action Unit Leader
Federal Facilities Program

A handwritten signature in dark ink, appearing to read "Tim Rehder".

Tim Rehder
EPA Manager
Rocky Flats Project

cc: Dave Shelton, Kaiser-Hill
Karen North, Kaiser-Hill
John Law RMRS
Laura Perrault, AGO
Steve Tarlton, RFPU

CURRENT RFEIS GROUNDWATER MONITORING NETWORK

FREQ	WELLNO	CLASS	FORMATION	DESCRIPTION
Quarterly	41691	B	AL	Agreement In Principal
Semiannual	10894	B	AL/BD	Agreement In Principal
Quarterly	08491	B	BD/UHSU	Agreement In Principal
Semiannual	B202589	B	AL	Rock Creek at Site boundary
Quarterly	10894	B	AL	Agreement In Principal
Quarterly	0388	B	BD/UHSU	Agreement In Principal
Quarterly	41691	B	AL	Agreement In Principal
Semiannual	B102389	D	AL	Rock Cr Below new landfill
Semiannual	7088	D	AL	Woman Cr Below Old Landfill
Semiannual	31791	D	AL/BD	Woman Cr Below 881 Hillside
Semiannual	8888	D	AL	Woman Cr Below 881 Hillside
Semiannual	10794	D	AL	Walnut Cr Below confluence of three forks
Quarterly	4087	D	AL	RCRA Downgradient Well - LF
Semiannual	3788	D		So. Walnut Creek below B4 Pond
Quarterly	52994	D		RCRA Downgradient Well - LF
Semiannual	75292	D	AL	So. Walnut Below Pond B5
Semiannual	10294	D	AL	SE Drainage below D2 Pond
Semiannual	8888	D	AL	No side Woman Cr downgradient of IA
Quarterly	52894	D		RCRA Downgradient Well - LF
Semiannual	53194	D		No Name Gulch below current landfill
Semiannual	38591	D	AL	Woman Cr Drainage below 881 Hillside
Semiannual	75992	D	AL	South Walnut Cr Below STP
Semiannual	1487	D	BD	Woman Creek Below OU2 VOC Plume
Quarterly	B208999	D	BD/UHSU	RCRA Downgradient Well - LF
Semiannual	B208789	D	AL	No Walnut Cr Monitoring
Semiannual	5888	D	AL	No. Woman Cr below IHSS 183.*
Semiannual	59393	D	AL	No. Woman Creek below old landfill IHSS
Semiannual	78992	D	AL	RCRA Downgradient - LF
Semiannual	10894	D	AL	No Walnut between A3 & A4 Pond
Semiannual	8488	D	AL	No Woman Cr below 881/884 pad
Semiannual	P114389	D	AL	Upgradient Walnut Cr Monitoring
Semiannual	5587	D	AL	No Woman below Fr. Drain on 881 Hillside
Semiannual	12094	D	AL	No Name Gulch below current landfill
Quarterly	1588	D	AL	RCRA Monitoring Below ITS - SEP
Semiannual	10594	D	AL	No. Walnut between A1 & A2 Pond
Semiannual	41091	D	AL	No. Walnut below pond A4
Semiannual	8588	D	AL	No. side Woman Cr below OU2
Semiannual	2987	D	AL	Woman Cr Below OU2 Outfall
Semiannual	05293	P	AL	Perimeter Monitoring
Semiannual	1988	P	AL	IM/IRA For IA - Plant Perimeter
Quarterly	P416889	P	AL	IM/IRA For Industrial Area
Semiannual	10994	P	AL	No. side of Woman Cr downgradient of IA
Semiannual	03691	P	BD/UHSU	Perimeter Monitoring - OU2
Semiannual	1187	P	BD/UHSU	Perimeter Monitoring - OU2
Quarterly	P218389	P	AL	RCRA Monitoring East - SEP
Quarterly	P208689	P	AL	RCRA Monitoring East - SEP
Semiannual	2988	P	AL	RCRA Monitoring East - SEP
Quarterly	P207889	P	AL	RCRA Monitoring East - SEP

18

Quarterly	B208189	P	BD/UHSU	RCRA Monitoring North - SEP
Quarterly	P418889	P	AL/BD	IM/IRA For Industrial Area
Quarterly	P207689	P	AL	RCRA Monitoring East - SEP
Quarterly	P416689	P	AL	IM/IRA For Industrial Area
Semiannual	02591	P	BD/UHSU	Perimeter Monitoring - OU2
Semiannual	05091	P	AL	Perimeter Monitoring - OU2
Quarterly	P114589	P	BD/UHSU	IM/IRA For Industrial Area
Semiannual	4787	P	AL	Perimeter Monitoring - 881
Semiannual	4887	P	AL	Perimeter Monitoring - 881
Quarterly	P210189	P	AL	Perimeter Monitoring - 771
Quarterly	P213689	P	AL	IM/IRA For Industrial Area
Quarterly	P314289	P	AL	IM/IRA For Industrial Area
Quarterly	P313589	P	AL	IM/IRA For Industrial Area
Semiannual	0487	P	AL	Perimeter Monitoring - OU1
Semiannual	8368	P	AL	Perimeter Monitoring - OU1
Quarterly	P418789	P	AL	IM/IRA For Industrial Area
Semiannual	2186	P	BD/UHSU	IM/IRA For IA - Plant Perimeter
Semiannual	B208089	P	AL	RCRA Monitoring North - SEP
Semiannual	03791	P	BD/UHSU	Perimeter Monitoring - OU2
Quarterly	P209589	P	BD	RCRA Monitoring Well - SEP
Semiannual	5387	P	AL	Perimeter Monitoring below 881
Semiannual	03991	P	AL	Plume Monitoring OU2
Semiannual	3087	P	BD	Perimeter Monitoring - OU2
Quarterly	P207889	P	BD	RCRA Monitoring East - SEP
Quarterly	P219489	P	AL	RCRA Monitoring East - SEP
Semiannual	04591	P	AL	Plume Monitoring - OU2
Semiannual	04091	P	AL	Perimeter Monitoring - OU2
Quarterly	P207389	P	BD/UHSU	RCRA Compliance Well
Semiannual	13391	P	AL	Perimeter Monitoring - OU2
Semiannual	77382	P	AL	Perimeter Monitoring - Landfill
Semiannual	31481	P	AL/BD	IM/IRA for French Drain
Semiannual	11691	P	BD/UHSU	Perimeter Monitoring - OU2
Semiannual	10184	P	AL	Perimeter Monitoring - OU2
Semiannual	8288	P	BD/USHU	Perimeter Monitoring - OU2
Semiannual	06291	P	BD	EPA/ODH Required - OU2
Semiannual	2588	P	BD	EPA Required - UHSU Bedrock
Quarterly	43382	P	AL	IM/IRA for French Drain
Semiannual	37791	P	AL	EPA Required IA above Bldg 881
Semiannual	8786	P	AL	EPA Required - Plant Perimeter
Semiannual	04991	P	AL	Perimeter Monitoring - OU2
Semiannual	9986	P	AL	EPA Required Perimeter Monitoring - OU2
Semiannual	05991	P	AL	Perimeter Monitoring - OU2
Quarterly	2886	P	AL	RCRA Monitoring South - SEP
Quarterly	P207789	P	BD/UHSU	RCRA Monitoring East - SEP
Semiannual	06091	P	AL/BD	Perimeter Monitoring - OU2
Quarterly	76282	P	BD/USHU	RCRA Monitoring
Semiannual	01291	P	AL	Perimeter Monitoring - OU2
Semiannual	06391	P	AL	EPA/CDH Required - OU2
Quarterly	10492	PM	BD/UHSU	IM/IRA For French Drain
Quarterly	10392	PM	AL	IM/IRA For French Drain
Quarterly	10792	PM	AL	IM/IRA For French Drain

Quarterly	10292	PM	BD/UHSU	IM/IRA For French Drain
Quarterly	11092	PM	AL	IM/IRA For French Drain
Quarterly	10192	PM	AL	IM/IRA For French Drain
Quarterly	10692	PM	AL	IM/IRA for French Drain
Quarterly	10692	PM	BD/UHSU	IM/IRA For French Drain
Semiannual	35691	PM	AL	IM/IRA for French Drain
Quarterly	10892	PM	AL	IM/IRA For French Drain
Quarterly	10092	PM	AL	IM/IRA for French Drain
Quarterly	45391	PM	AL	IM/IRA for French Drain
Quarterly	10592	PM	AL	IM/IRA for French Drain
Semiannual	1386	P/D	AL	RCRA Monitoring Below ITS - SEP
Semiannual	P210089	P/D	BD	RCRA Monitoring North - SEP
Quarterly	B208689	P/D	BD/UHSU	RCRA Monitoring Below ITS - SEP
Quarterly	1886	P/D	AL	RCRA Monitoring Below ITS - SEP
Quarterly	B210489	P/D	AL	RCRA Monitoring Below ITS - SEP
Quarterly	B210389	P/D	BD/UHSU	RCRA Monitoring Below ITS - SEP
Semiannual	B208589	P/D	AL	RCRA Monitoring Below ITS - SEP
Semiannual	1786	P/D	AL	RCRA Monitoring Below ITS - SEP
Semiannual	B208289	P/D	BD/UHSU	RCRA Monitoring Below ITS - SEP
Quarterly	P209789	R	AL	RCRA Monitoring East - SEP
Quarterly	P114789	S	AL	IM/IRA For Industrial Area
Semiannual	P216289	S	AL	IM/IRA For Industrial Area
Quarterly	P115489	S	AL	IM/IRA For Industrial Area
Quarterly	P114689	S	AL	IM/IRA For Industrial Area
Semiannual	10991	S	BD	EPA required Plume Monitoring - OU2
Quarterly	P114889	S	AL	IM/IRA For Industrial Area
Semiannual	P215789	S	AL	IM/IRA For Industrial Area
Quarterly	P313489	S	AL	IM/IRA For Industrial Area
Quarterly	6687	S	AL	RCRA Compliance Well - LF
Quarterly	P115689	S	AL	IM/IRA For Industrial Area
Semiannual	12691	S	BD/UHSU	Perimeter Monitoring - OU2
Semiannual	12491	S	BD/UHSU	Source Monitoring - OU2
Semiannual	03191	S	AL	Source Monitoring - OU2
Semiannual	08091	S	AL	Source Monitoring - OU2
Semiannual	00491	S	AL/BD	Source Monitoring - OU2
Semiannual	1067	S	AL	Source Monitoring - OU1
Semiannual	P320089	S	AL	EPA Required - Industrial Area
Quarterly	6186	S	AL	IM/IRA For Industrial Area
Semiannual	07391	S	AL/BD	Source Monitoring - OU2
Semiannual	06391	S	AL	Source Monitoring - OU2
Quarterly	P116589	S	AL	IM/IRA For Industrial Area
Semiannual	00391	S	BD	EPA Required Source Monitoring - OU2
Quarterly	5687	U	AL	RCRA Upgradient Well - LF
Quarterly	70193	U	BD/UHSU	RCRA Upgradient Well - LF
Quarterly	2486	U	AL	RCRA Upgradient Well - SEP
Quarterly	P209289	U	AL	RCRA Upgradient Well - SEP
Quarterly	70093	U	AL	RCRA Upgradient Well - LF
Semiannual	70493	U	BD/UHSU	RCRA Bedrock Upgradient Well - LF
Quarterly	70393	U	AL	Upgradient Contamination
Quarterly	P416289	U	AL	IM/IRA For Industrial Area
Semiannual	P119389	U	AL	IM/IRA For Industrial Area

Quarterly	P410500	U	AL	IM/IRA For Industrial Area
Quarterly	P410500	U	BD	IM/IRA For Industrial Area
Quarterly	70503	U	BD	Upgradient Contamination
Quarterly	P208300	U	BD	RCRA Upgradient Well - SEP
	0			
			P - Perimeter	
			B - Boundary	
			D - Drainage	
			PM - Performance	
			S - Source	
			U - Upgradient	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET SUITE 500
DENVER COLORADO 80202 2466

MAR - 6 1996

Ref 8P2 W P

Lenora J Lewis
Assistant Manager for
Government Operation
Department of Energy
Rocky Flats Field Office
P O Box 928
Golden Colorado 80402-0928

Re NPDES Permit CO-0001333
Rocky Flats Environmental
Technology Site

Dear Ms Lewis

This is in response to Mr James Hartman's October 31 1995 letter concerning the March 1991 Federal Facilities Compliance Agreement (FFCA) between DOE and EPA for the Rocky Flats Environmental Technology Site (RFETS). Based on the letter, its enclosures, and subsequent telephone conversations between Cheryl Row Bob Shankland and Michael Reed it is EPA's understanding that DOE wants to close out most portions of the FFCA by the end of FY96.

EPA agrees to close or revise those portions of the FFCA that are complete or no longer relevant as follows:

- 1 The sludge treatment storage and disposal portion of the FFCA (Part IV) has been satisfactorily completed and is closed.
- 2 The reporting of progress reports on the upgrade of the sewage treatment plant, the drain identification study (DIS) and the tank management plan (TMP) is changed from quarterly to semi annually. The next report will cover the period October 1 1995 through March 31 1996 and is due April 30 1996.

However those portions of the FFCA pertaining to effluent limitations (Part I) effluent monitoring (Part II) and the reporting of monitoring results will have to remain in effect until those requirements can be addressed in some other enforceable document.

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00583



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22

The letter indicated that the following reports would be completed by the end of FY96

- 1 the upgrade of the sewage treatment plant,
- 2 the drain identification study (DIS), and
- 3 the tank management plan (TMP)

Upon satisfactory completion of these items, the Compliance Plan contained in Part III will be considered achieved and that portion of the FPCA may then be closed

Questions concerning this letter and other NPDES issues concerning RFETS should now be addressed to Michael Reed at 312-6132 as Bob Shankland retired from EPA as of January 3 1996

Sincerely,

William P. Felt
William P. Felt
Regional Administrator

cc Bob Shukla Colorado DPH&E, WQCD
Judy Bruch, Colorado DPH&E
Tim Rehder (SENF-T)
Peggy Livingston (RC)
Cliff Villa (SENF-L)
Don Terrell (SENF-T)

Best Available Copy



Rocky Flats Environmental Technology Site
P.O. Box 464
Golden Colorado 80402-0464
Phone (303) 966 2678
Fax (303) 966 8244

April 11 1996

96 RF 01857
96 RM ER 0041 KH

Karan North
Environmental Compliance
Kaiser Hill L.L.C.
Rocky Flats Environmental Technology Site
P.O. Box 464 Bldg T130C
Golden CO 80402 0464

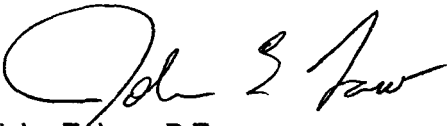
CONFIRMATION OF RESCOPE OF THE NPDES FFC AGREEMENT (KH00003NS1A) -- JEL-042-96

The March 6 1996 correspondence from the U.S. Environmental Protection Agency (EPA) to Lenora J. Lewis (Department of Energy/Rocky Flats Field Office [DOE/RFFO]) regarding National Pollutant Discharge Elimination System (NPDES) Permit CO 0001333 Rocky Flats Environmental Technology Site addresses close out and/or revision of selected portions of the NPDES Federal Facility Compliance Agreement (FFCA). In particular, RMRS understands that the EPA agrees to the closure or revision of drain identification study (DIS) and tank management plan (TMP) activities by the end of FY96. RMRS further interprets this closure and revision agreement as covering the terms of the rescope proposal submitted by DOE/RFFO to EPA on October 31, 1995. Thus, the rescope proposal replaces that specified in the FFCA §III(B) which references the Chronic Acid Implementation Plan (November 20, 1992).

RMRS interprets the satisfactory completion criteria in the EPA's March 6, 1996 letter to mean that EPA accepts (1) the reduction of DIS scope to include only moderate and high risk buildings as set forth in the October 31, 1995 letter from DOE/RFFO to EPA, and (2) the discontinuance of programmatic inspections under the TMP which transfers the control and authority for routine integrity testing of uninspected aboveground tanks to the discretion of the building owners in FY98. Programmatic TMP funding will be planned for FY97 in the Surface and Groundwater Program. RMRS will continue to provide semi-annual FFCA progress reports through October 1996.

Karan North
April 11 1996
96 RF 01857
Page 2

Please provide your concurrence on this interpretation of the March 6 1996 EPA letter
RMRS also recommends because of the significant cost issues associated with this change in
FFCA rescope that a follow up correspondence be initiated with EPA to clarify the collective
Kaiser Hill Team understanding of the new NPDES FFCA approach



John E. Law P E
Remediation Manager
Sitewide Actions
RMRS L L C

KMM dqI

cc

G M Kelly

G H Setlock

DOE ORDER # 54001

Mr Don Terrell

2

APR 30 1996

The attached Internal Wastestream (IWS) report updates information in Form 2C Section 3 of the pending application for renewal of the National Pollutant Discharge Elimination System (NPDES) Permit. The report augments the March 1993 submittal for re application and describes additional routine industrial influent sources to the Rocky Flats Environmental Technology Site (Site) Wastewater Treatment Plant (WWTP). The attached IWS report identifies

- 1 Internal Waste Stream tracking number
- 2 Building number and location of the source (if applicable)
- 3 Description of the waste stream, and
- 4 Approximate volume discharged on an annual basis

Site industrial sources are expected to contribute flow either continuously or periodically as indicated in the description, until removed from the IWS list. None of the Site industrial sources are expected to increase the level of pollutants released through Outfall STP. Changes to the IWS list are made internally on a regular basis to provide current information regarding new or old internal waste streams to the WWTP as required under Part II A 1 Change in Discharge of the current permit.

Waste streams previously reported in the March 1993 NPDES Permit application, under the Internal Waste Stream Program, are currently under review. The review includes confirmation that the waste streams continue to flow to the sanitary sewer system and the assignment of an IWS tracking number to each confirmed waste stream. Those waste streams previously reported but which no longer exist will be deleted from the system.

Sincerely


David A. Brockman
Assistant Manager for
Strategy Integration and Guidance

Enclosure

cc w/o enc
B April ELG RFFO
S Tower EA RFFO
J Stover ELG RFFO
R Tyler EA RFFO
G Setlock K H

21



Rocky Flats Environmental Technology Site

PO Box 464

G Id C I rad 80402-0464

Pho (303) 966 2678

F (303) 966-8244

April 26 1996

96 RF 02613
96 RM ER 0063 DOE

John A Stover
Environmental Liaison Group
The Department of Energy/Rocky Flats Field Office
Rocky Flats Environmental Technology Site
P O Box 928 Bldg 116
Golden CO 80401


**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM/FEDERAL FACILITY COMPLIANCE
AGREEMENT SEMI ANNUAL REPORT (KH00003NS1A) – JEL-077 96**

Action Transmit to the EPA

The Semi Annual Progress Report as required under Section V C of the National Pollutant Discharge Elimination System (NPDES) Federal Facilities Compliance Agreement (FFCA) is enclosed for your review. The report is due to the U S Environmental Protection Agency (EPA) on April 30 1996 as stated in the EPA letter of March 6 1996. Included in this correspondence is a draft letter for your use in transmitting the report to EPA. The draft letter includes the Kaiser Hill Team's clarification of EPA's March 6 1996 letter which agreed with DOE's proposed rescope of the FFCA activities. Submittal of the Semi Annual Report completes milestone 00400 in work package number 12384.

The Annual Internal Wastestreams Report is also included in this correspondence for transmittal to EPA. This report is not related to the FFCA but is required by EPA to update Form 2C and should be received by the same EPA representative. The report and the attachment should be sent to Michael Reed at the Region VIII office of the EPA.

Please contact me at extension 4842 or Frank Rukavina at extension 7370 if you have any questions.


for John E. Law P.E.
Remediation Manager
Sitewide Actions

FR dqi

Attachments
As Stated

cc

G H Setlock

Kaiser Hill

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DRAFT

April 26 1996

Michael Reed
U S Environmental Protection Agency Region VIII
ATTN Rocky Flats Project Manager 8HWM RI
999 18th Street Suite 500 8WM-C
Denver Colorado 80202 2405

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM/FEDERAL FACILITIES COMPLIANCE AGREEMENT SEMI ANNUAL REPORT AND CONFIRMATION QF RESCOPE AND WASTESTREAM REPORT

The Semi-Annual Progress Report of the National Pollutant Discharge Elimination System (NPDES) Federal Facilities Compliance Agreement (FFCA) is enclosed as required under Section V C of the agreement. The report is now required semi-annually rather than quarterly and due to the U S Environmental Protection Agency (EPA) on April 30 1996 as stated in the EPA letter of March 6 1996 (Ref 8P2 W P). Also included in this correspondence is clarification of EPA's March 6 1996 letter concerning DOE's proposed rescope of the FFCA activities. In addition the Annual Internal Wastestreams Report is included in this correspondence.

The March 6 1996 correspondence from the EPA to Lenora J Lewis Department of Energy/Rocky Flats Field Office (DOE/RFFO) regarding NPDES Permit CO-0001333 Rocky Flats Environmental Technology Site addresses close-out and/or revision of selected portions of the NPDES FFC Agreement. In particular the DOE Kaiser Hill Team (Kaiser-Hill [K H] and Rocky Mountain Remediation Services [RMRS]) understand that EPA agrees to the closure or revision of drain identification study (DIS) and tank management plan (TMP) activities by the end of FY96. The K H Team further interprets this closure and revision agreement as covering the terms of the rescope proposal submitted by DOE/RFFO to EPA on October 31 1995. Thus the rescope proposal replaces that specified in the FFCA §III(B) which references the Chromic Acid Implementation Plan (November 20 1992).

The K H Team interprets the satisfactory completion criteria in the EPA's March 6 1996 letter to mean (1) focusing on and completing the moderate to high risk buildings for the DIS project and (2) discontinuing programmatic inspections under the TMP and transferring control and authority for routine integrity testing of tanks to building owners in FY98.

Please provide your concurrence on this interpretation of the March 6 1996 EPA letter. DOE also recommends because of the significant cost issues associated with this change in FFCA rescope that a follow up correspondence be initiated to clarify the collective understanding of the new NPDES FFCA approach. The DOE will assume EPA concurrence with the contents of this letter (i.e. interpretation of NPDES FFCA rescope) if no response is received within 14 days of transmittal of this letter.

The attached Internal Wastestream (IWS) report updates information in Form 2C Section 3 of the pending application for renewal of the National Pollutant Discharge Elimination System (NPDES) Permit. The report augments the March 1993 submittal for re application and describes additional routine industrial influent sources to the Rocky Flats Environmental Technology Site (Site) Wastewater Treatment Plant (WWTP). The attached IWS report identifies

- 1 Internal Waste Stream tracking number
- 2 Building number and location of the source (if applicable)
- 3 Description of the waste stream and
- 4 Approximate volume discharged on an annual basis

Michael Reed
Page 2

Site industrial sources are expected to contribute flow either continuously or periodically as indicated in the description until removed from the IWS list. None of the Site industrial sources are expected to increase the level of pollutants released through Outfall STP. Changes to the IWS list are made internally on a regular basis to provide current information regarding new or old internal waste streams to the WWTP as required under Part II A 1 Change in Discharge of the current permit.

Waste streams previously reported in the March 1993 NPDES Permit application under the Internal Waste Stream Program are currently under review. The review includes confirmation that the waste streams continue to flow to the sanitary sewer system and the assignment of an IWS tracking number to each confirmed waste stream. Those waste streams previously reported but which no longer exist will be deleted from the system.

Sincerely

NPDES FFCA
SEMI ANNUAL
PROGRESS REPORT

April 26 1996

REPORT NUMBER 23

The NPDES Federal Facilities Compliance Agreement (FFCA) Section V C 1 requires quarterly progress reports be submitted to EPA within 28 days following the end of the quarter. This reporting requirement was changed from quarterly to semi annual in the EPA letter of March 6 1996 (Ref 8P2 W P). This report is submitted in response to that requirement, and covers activities during the period October 1 through March 31 1996

FFCA Item	Required Action	Due Date	Status
FFCA Effective Date		March 25 1991	Complete Signed by DOE Rocky Flats Office March 19 1991 Signed by EPA Region VIII March 25 1991
Effluent Limitations (Sect I)	Effluent limitations for Outfall 001 apply at the STP discharge rather than Pond B-3 Chromium limitations at Outfalls 005 006 and 007	April 1 1991	Complete Monthly reporting was modified to incorporate revised effluent monitoring requirements. These changes were implemented beginning with the April 1991 Discharge Monitoring Report (DMR)
Effluent Monitoring (Sect II)	Monitoring of STP effluent for volatile organic compounds and metals. Whole Effluent Toxicity (WET) monitoring of the STP effluent and A-4 B-5 and C 2 pond discharges	June 30 1990	Complete Monthly reporting has been modified to incorporate revised effluent parameters and monitoring requirements. These changes were implemented beginning with the April 1991 DMR. Data collected in good faith prior to the signing of the FFCA, between June 1 1990 and March 30 1991 were summarized and included with the Progress Report submitted for fourth quarter 1991. Whole Effluent Toxicity (WET) testing of the STP and the terminal ponds was decreased from monthly sampling and analyses to quarterly sampling and analyses per the September 1 1992 letter to James Hartman signed by Glenn Rodriguez, EPA Region VIII. Quarterly WET testing of the STP and terminal ponds at discharge was implemented October 1 1992
Compliance Plan (Sect III A)	Submit a Compliance Plan to EPA to include a diagnostic evaluation of the STP instrumentation upgrades sludge drying bed improvements and influent/effluent containment provisions	July 30 1990	Complete Implementation of the Compliance Plan has been initiated (see following)

FFCA Item	Required Action	Due Date	Status
Compliance Plan (Sect III A continued)	Influent Instrumentation to monitor pH conductivity and other STP influent parameters (Compliance Plan Sect II A 1)	May 1990	Complete
	Autochlorination/ Dechlorination (Compliance Plan Sect II A 2)	March 1991	Complete
	Instrumentation to include a Parshall flume backwash control for sand filters dissolved oxygen for aeration basin and additional effluent monitoring controls (Compliance Plan Sect II A.3)	December 1991	Complete
	STP Facility Upgrades Phase I Drying Beds Capacity Improvements (Compliance Plan Sect II B)	October 1992	Complete
	STP Facility Upgrades Phase II Miscellaneous utility equipment and facility upgrades (Compliance Plan Sect II C)	Baseline Completion October 1992 Forecast Completion April 1996	Design engineering was completed in December 1994 the construction contract was awarded in April 1995 and construction commenced in May 1995 Construction will be complete in April 1996
	STP Facility Upgrades Phase III Influent/effluent containment nitrification/denitrification (Compliance Plan Sect II C)	TBD based on NPDES permit development	A solicitation was issued on October 3 1995 for a design Build subcontract for Influent/effluent storage tanks Contract was awarded February 1996 completion of construction is anticipated second quarter FY 97 prior to regulatory agency requirement as defined in the Industrial Area IM/IRA
	Perform a diagnostic evaluation of the STP and implement operational recommendations (Compliance Plan Sect II D)		The nitrification/denitrification portion of the project has been canceled because the unionized ammonia standard for the Walnut Creek drainage on plant site was eliminated
			Complete

FFCA Item	Required Action	Due Date	Status
Chromic Acid Incident Plan (Sect III B)	Submit a Chromic Acid Incident Plan (CAIP) to EPA addressing the findings of the Report of the Chromic Acid Incident Investigation at Rocky Flats	November 15 1990	Complete Implementation of the CAIP has been initiated (see following)
	Tank Management Plan (CAIP Sect.1 1)	Baseline Completion November 30 1995 Forecast Completion November 30 1998	The Tank Management Plan is an above ground tank inspection and testing program An initial inventory of 2685 tanks was completed September 15 1994 The Master Tank Database currently contains a total of 2811 tanks The initial testing and inspection cycle began as scheduled on December 1 1992 and was scheduled to complete November 30 1996 The new forecast completion date is November 30 1998 To date all but 578 tanks have received visual inspection or ultrasonic testing Due to funding constraints tank inspections were not funded during FY96 Funding for the TMP is being sought for FY97 with the responsibility for tank inspections being transferred to operational area management in FY98
	Tank Surveillance Program (CAIP Sect 1 2)	December 22 1992	Complete
	Instrumentation Development (CAIP Sect 2 0)	Ongoing	Respirometer Complete Microtox Toxicity Test Complete Telemetry and Water Quality Reporting Remote monitoring equipment located at ten sites has been collecting and reporting water quality and surface water flow data for some 57 months Data is used to supplement regulatory reporting requirements for the DMR and the NPDES monthly reports for flow discharge
	Geotechnical Evaluation of the B-5 Dam Structure (CAIP Sect.3 0)	August 31 1993	Complete
	Drain Identification Study (CAIP Sect.4 0)	Baseline Completion March 31 1996 Forecast Completion September 30 1996	The Drain Identification Study (DIS) is a source control program conducted in buildings which contain inappropriate sources of influent to the sanitary sewer system The DIS reescop now includes 112 of the 197 buildings originally designated for inspection at the Site Due to low potential risk 85 Buildings were excluded from the DIS
Groundwater Monitoring Plan for the Sludge Drying Beds (Sect. IV C)	Submit a groundwater monitoring plan to EPA for the area beneath the STP sludge drying beds	July 30 1990	Field inspections have been conducted in 110 buildings and completed in 55 Complete

Internal Waste Stream Report

IWS Number	Building Number / Location	Description	Volume (Gal./Year)
R001-00	903A Pad / Main Decontamination Facility	2,400 gal./week of decontamination wash water	124 800
R002-00	Protected Area Decontamination Pad	2 400-4 800 gal./month of decontamination wash water	28 800 57 600
R003-00	549	200 gal./month of water used in hydrostatic testing of fire extinguisher cylinders	2400
R004-00	443 / Room 203	300 gal./day of Steam Plant waste waters	78 000
R005-00	443 / Room 103	800 gal./day of water for regeneration of portable water softeners	208 000
R005-01	443 / Room 103	3 000 gal./month of salt water solution from the regeneration of water softeners	36 000
R006-00	443 / Room 101	Less than 500 gal./year condensate waste water	500
R007-00	443 / Room 103	8 000 gal./3 month period of salt water solution from regeneration and backwash of #1 & #2 polishers	32 000
R008-00	460 / Room 141	60 gal./week of condensate waste water	3 120
R009-00	708	3 000 gal./year of blowdown once per shift, of building AC units moisture separators	3 000
R010-00	771 / Rooms 233 235 237, & 238A	300 gal./day of make-up water from the supply fan air washers	78 000
R011-00	886 Room 103	5 10 gal./week of waste water from safety shower and eye wash	520
R012-00	331F / compressor	Trace amounts/month of water from purging air compressor	100
R013-00	776 / second floor	200 gal / every three months of water and ethylene glycol mixture from the filter plenum #250 fire suppression system	800
R014-00	566 / laundry	130 000 gal / month of laundry waste waters	1 560 000
R015-00	373 / cooling tower	150 000 gal./year of blowdown from cooling tower	150 000

34/34